



Fyfe Modern Slavery Statement FY25

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Message from our CEO

Fyfe Holdco Pty Ltd (reporting entity) (“Fyfe”) is an Australian integrated engineering, survey, environment and planning company currently employing approximately 800 people across major capital cities and regional centres in Australia. We deliver value for clients in the energy and resources, renewables, power, property and infrastructure sectors.

Fyfe is committed to providing rewarding careers for our people and giving them the opportunity to develop their expertise through on-the-job training and structured learning opportunities.

We are also committed to running an ethical business and upholding human rights, including by mitigating modern slavery risks across our supply chains. We understand that Australia is not immune to modern slavery and acknowledge our responsibility to prevent, mitigate and remedy it in our operations and supply chains.

I am pleased to present our first Modern Slavery Statement (“Statement”) relating to the reporting period of **1 July 2024 to 30 June 2025**.

This Statement speaks to the preliminary steps that Fyfe has taken in its Modern Slavery Compliance Framework as a reporting entity pursuant to section 5 of the Modern Slavery Act 2018 (Cth) in FY25. This statement outlines the steps Fyfe will take in the next reporting period as we evolve our Modern Slavery Compliance Framework.

A handwritten signature in black ink, appearing to read 'Liza Maimone', written in a cursive style.

Liza Maimone, Chief Executive Officer

On behalf of the Board of Fyfe Holdco Pty Ltd:

A handwritten signature in blue ink, appearing to read 'Stephen Warren', written in a cursive style.

Stephen Warren, Company Secretary and CFO

About Fyfe

Fyfe is a private company with 102 shareholders. Founded in South Australia as a surveying company specialising in property services, we maximised opportunities for growth in the 80s and 90s to become a fully integrated engineering, environment, planning and survey firm. For decades, we have worked alongside the energy, resources, property and infrastructure sectors to plan, design and deliver complex projects that underpin safe, productive and sustainable operations. As our clients' needs have evolved, so have we, with teams working out of our network of offices across Australia to service our clients efficiently and proactively.

Fyfe has pursued a strong growth ambition throughout 2025. Following a significant investment by Mercury Capital in April 2024, we set a new strategy for growth. This calendar year, we acquired environmental consultancy NGH (January 2026), electrical engineering firm Middleton Group (September 2026) and environmental consultancy Ecology and Heritage Partners (October 2026). This enabled us to expand our capabilities across electrification, planning approvals, environment, heritage, social impact and community engagement and expand our services across the Eastern States. We are investing in people, technology and capability to support our clients through the energy transition and with their critical infrastructure projects.

A key element of Fyfe's success is how we interact with all stakeholders including employees, shareholders, clients and communities. Throughout our history, we have adopted and developed systems to ensure we meet and exceed stakeholder expectations. These standards are achieved through our company-wide commitment to effective operations management, underpinned by our certified ISO systems.

Fyfe's many regional offices place us near our clients' projects, providing a local understanding of the issues that impact communities. Supporting these local communities is part of our operating culture - we provide employment, use local accommodation, become members of local clubs, and sponsor events and organisations.

Fyfe is an equal opportunity employer and strives to create an inclusive environment for its workforce that accepts everyone's differences, embraces their strengths and provides opportunities for all our people to achieve their full potential.

"Our **mission** is to deliver sustainable and innovative solutions that are tailored to our client's needs"

"Our **vision** is to be the leaders in providing exceptional consultancy services that exceed client expectations whilst enhancing career opportunities for our people"

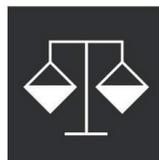
"Our **ambition** is to deliver tomorrow's sustainable future today by supporting Australia to drive the energy transition and to enable critical infrastructure projects. We will do this by deploying our breadth of integrated capabilities."

Fyfe Values



RESPECT

We encourage different opinions and the development of strong relationships based on mutual trust and understanding.



INTEGRITY

We value honesty, responsibility and professionalism. We do what we say we will do.



ACCOUNTABILITY

We empower our staff to deliver on their commitments and strive to exceed expectations in delivering value to our clients & colleagues.



RESPONSIVENESS

We drive delivery and provide high quality, timely advice to our clients.



PASSION

We are engaged in what we do and take pride in the quality of work we deliver.

Criteria 1 – Reporting Entity

The reporting entity is Fyfe HoldCo Pty Ltd ACN 673 720 879.

Criteria 2 – Structure, Operations and Supply Chains

2.1 Structure

For this statement, Fyfe’s controlled entities are listed in the table below:

Controlled entities within Fyfe HoldCo Pty Ltd at 30 June 2025

Subsidiaries of Fyfe HoldCo Pty Ltd and its Controlled Entities:	Country of incorporation	Ownership 2025 %
Fyfe Fin-Co Pty Ltd	Australia	100
Fyfe Bid Co Pty Ltd	Australia	100
Fyfe Group Holdings Pty Ltd	Australia	100
Fyfe Pty Ltd	Australia	100
DF Project Management Pty Ltd	Australia	50
Fyfe Australia Investments Pty Ltd	Australia	100
Emanden Technical Solutions Pty Ltd	Australia	-
Wunbungoo Pty Ltd	Australia	49
NGH Pty Ltd	Australia	100
NGH NQ Pty Ltd	Australia	100
NGH Environmental Pty Ltd	Australia	100

**On 31st January 2025 Fyfe Group Holdings Pty Ltd acquired 100% of the share capital of NGH Pty Ltd.*

2.2 Our People

We currently have approximately 800 employees located in offices across the country, with our three largest offices being Adelaide, Brisbane and Melbourne. The majority of our people are employees, and we also have a small number of contractors (3%).

At 30 June 2025 (i.e. the reporting period) we had 617 employees. In addition to our onshore employees, we also had 24 people (3.9%) in the Philippines sourced through Employers of Record (EOR).

2.3 Board of Directors

Our Board of Directors consists of six Directors, three of whom represent our major investor, Mercury Capital, and three of whom represent other Fyfe shareholders. The Board of Directors is responsible for our Corporate Governance and setting our business strategy. For the reporting period, Gary Spence was the Managing Director of Fyfe.

2.4 Operations

Fyfe is a national business with teams operating across all Australian States and Territories, delivering services across the following sectors aligned to our Strategy:

- Energy & Resources
- Renewables
- Power Networks
- Urban Development, Transport, Water and Wastewater, and
- Data Centres.

Our strength lies in bringing together multiple disciplines to solve complex problems in energy transition and critical infrastructure projects. Our key disciplines are in engineering, surveying, environment and planning.

2.5 Supplier Relationships

Fyfe recognise that suppliers are integral to our operations and our ability to provide the highest quality of services to our clients. We believe that our suppliers should share our values and comply with our high ethical, quality, environmental, health and safety standards.

Fyfe's current Tier 1 suppliers are predominantly based in Australia, and we aim to support local businesses in our various locations wherever possible.

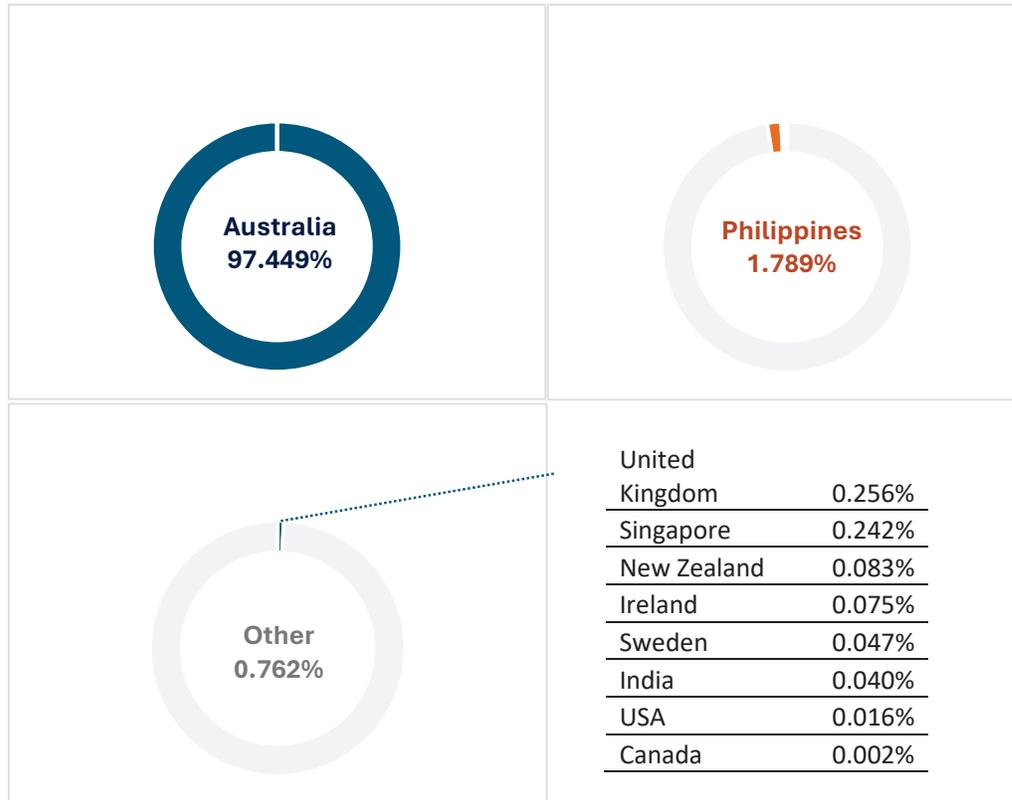
While most of our Tier 1 Suppliers are based in Australia, we do have some suppliers that are based in other countries. We also use subcontractors to help us deliver client services.

2.6 Supply Chains

To carry out our operations, Fyfe requires a range of suppliers to provide us with products and services. For the purposes of this Statement, we have defined suppliers as those entities that provide the goods and services to our operations.

We have provided a breakdown of supply chain spend by location for suppliers and subcontractors in the figure on next page. The data also include data from NGH suppliers, but not from Middleton Group and Ecology and Heritage Partners as they were not part of Fyfe during the reporting period.

Breakdown of supply chain spend by location for suppliers and subcontractors



We have determined that Fyfe does not have supply relationships with any countries named on Walk Free’s [Global Slavery Index most prevalent list](#).

As this is our first reporting period, we have limited this Statement to our Tier 1¹ suppliers for the reporting entity as outlined in Criteria 1.

Fyfe is committed to gaining a greater understanding of our supply chain in future reporting periods and will include recent acquisitions in our future Statements.

Criteria 3 – Risks of Modern Slavery

3.1 Our understanding of risks

Fyfe understands that risks of modern slavery can present in operations and supply chains due to various factors. Modern slavery is a challenging global issue due to the complexity of supply chains in an interconnected world. Many factors must be examined to determine where higher risks of modern slavery may present in our supply chains.

While Fyfe’s operations are considered to be lower-risk due to our skilled workforce and the direct employment of the majority of employees, risks of modern slavery may exist within our supply

¹ **Tier 1 Suppliers** represent the most significant suppliers accounting for over 30% of total spend where Fyfe purchases goods/services directly from, and are the easiest to audit and engage with on compliance issues.

chains, particularly concerning imported materials (electronics, raw resources) and lower-tier outsourced services (cleaning, maintenance) using vulnerable migrant labour.

Whilst the below “risk factors” are not direct evidence of modern slavery, they are risk factors which may indicate broader modern slavery practices within a supplier:

- Significant overtime hours and/or failure to pay overtime rates
- Poor record keeping practices
- Lack of personal protective equipment (PPE)
- Inadequate workplace health and safety practices
- Failure to pay minimum wage or living wage

We have several key policies and procedures in place which include:

- Modern Slavery
- Human Rights
- Code of Conduct
- Anti Bribery and Corruption
- Whistleblower
- Workplace Health & Safety

3.2 Identifying our modern slavery risks

In identifying our modern slavery risks, we consider whether we cause, contribute to, or are directly linked to any modern slavery:

- **Cause:** An entity causes the modern slavery itself via its activities or omissions which results in harm
- **Contribute To:** Activities or omissions by an entity which facilitate, enable or incentivise modern slavery and harm
- **Directly Linked:** An entity being linked to harm through its products, services or business relationships.

Our operations are located within Australia and at 30 June 2025 we had 617 employees (i.e. the end of the reporting period). In addition to our onshore employees, we also had 24 people (3.9%) in the Philippines sourced through Employers of Record (EOR) third party provider.

We operate in an industry which is highly regulated and in a country in which the prevalence of modern slavery is considered low. In addition to this, Fyfe’s own operations are compliant by:

- Paying all employees in accordance with the relevant Australian laws and requirements
- Ensuring our Philippine team engaged via Employers of Records is paid competitive salaries and receiving full employment benefits and entitlements as prescribed by the Philippines Department of Labor and Employment
- Providing avenues for reporting concerns or grievances through various mechanisms, including through our whistleblower mechanism
- Supporting our employees through our employee assistance program
- Providing workplace health and safety training, and requiring the completion of daily timesheets

- Introducing a training structure for our employees on modern slavery and our Modern Slavery Compliance Framework, which will be implemented in FY26

Like all entities, Fyfe is not immune to the risks of modern slavery, particularly deeper within our supply chains.

Per the Walk Free Foundation’s Global Slavery Index, we understand that countries differ in the prevalence of modern slavery. Suppliers to Fyfe who employ people from vulnerable populations or who operate in countries or industries where these vulnerable populations are more prevalent are treated as high risk.

Fyfe understands that certain sectors carry higher modern slavery risks due to the type of work being carried out by its employees, as well as industries that are traditionally reliant on migrant workers and temporary workers. We generally consider that any worker on a visa carries heightened vulnerability to fall into modern slavery conditions. For Fyfe, the high-risk industries that intersect with high-risk location risks are:

Industry Prevalence		Relevance to Fyfe
Recruitment and labour	One of the biggest modern slavery risks for labour hire and recruitment is the use of third-party labour hire contractors. These third-party labour hire contractors can be unregulated and may not have adequate processes in place to inform workers of their rights	<p>Fyfe engages staff in the Philippines through reputable and compliant third-party Employer of Records.</p> <p>Fyfe also engages hospitality, cleaning and manufacturing suppliers who may use third party labour hire and recruitment providers.</p> <p>Our Tier 1 suppliers predominately operate in Australia, but we understand that the prevalence of Modern Slavery in base-skill labour industries can drastically elevate when combined with high-risk geographical locations.</p>
Cleaning	The cleaning industry has been identified as a key risk area in Australia. This is largely due to the nature of the workforce, who are often unskilled and uneducated; the complexity of the industry itself; and the opaque nature of their operations.	Fyfe engages with cleaning companies to maintain its operations. Accordingly, due to the prevalence of these suppliers in our supply chains, this is a high-risk industry for Fyfe. As per the recruitment and labour industry, base-skill labour industries can drastically elevate risk when combined with high-risk geographical locations.

Whilst 98% of suppliers to Fyfe in the reporting period were based in Australia, we understand that as we delve more deeply into our supply chain, we expect the geographical location of suppliers to widen. This will change the risk profile of our supply chains.

Fyfe acknowledges the complexities of addressing modern slavery and achieving compliance with the requirements of the Act. The actions undertaken in this reporting period are outlined in Criteria 4 below.

Criteria 4 – Actions to Address Modern Slavery

This is Fyfe’s first reporting period under the Act. The actions undertaken by Fyfe in this first reporting period were to establish a framework to support comprehensive reporting in the future.

The actions undertaken in this reporting period are just the beginning of Fyfe’s modern slavery compliance journey. We are committed to implementing the suitable mechanisms to meaningfully identify the risks of modern slavery and develop necessary mitigating actions.

In the reporting period, Fyfe has implemented the following:

- Partnered with eftsure for onboarding of suppliers and vendors
- Developed a risk matrix to assist us with assessing our modern slavery risk
- Began inserting modern slavery clauses in our supplier contracts
- Published modern slavery, human rights, Whistleblower and anti-bribery and corruption policies
- Conducted in-house employee engagement surveys to identify any matters of concern about Fyfe’s commitment to a safe workplace, which is free of discrimination, bullying or harassment
- Identified our Tier 1 Suppliers and commenced collecting information on their Modern Slavery commitments

Criteria 5 – Assessing Effectiveness

As this is Fyfe’s first Modern Slavery Statement, the focus of this reporting period was to develop Fyfe’s Modern Slavery Compliance Framework. Laying the foundation of a robust Modern Slavery Compliance Framework will support us to genuinely and meaningfully comply with the Act’s reporting and due diligence requirements.

This year Fyfe has enhanced our existing Safetrac Compliance subscription to include the Modern Slavery Toolkit to assist and streamline Fyfe’s compliance with the Act.

Our Safetrac subscription has several features that will support us in the future to:

- Provide modern slavery training to our people
- Identify the risks in operations and supply chains
- Increase organisational awareness of modern slavery
- Simplify the supply chain audit process
- Support us to assess our compliance with the Act
- Audit our supplier’s practices and compliance with the Act
- Demonstrate compliance with the requirements of the Act

To assist us in assessing effectiveness in the future, we will deploy the Safetrac Modern Slavery toolkit.

Criteria 6 – Consultation

Key people within Finance, Operations, Human Resources and Health, Safety, Environment and Quality (HSEQ) across Fyfe were engaged throughout the development of our Modern Slavery Compliance Framework and in the drafting of this Modern Slavery Statement, including key managers.

The final Statement has been endorsed by the Board and signed by our Company Secretary on behalf of the Board and who is a member of the Board.

Criteria 7 – Looking forward

Fyfe will continue to build on the initial steps we have taken in this reporting period to build, mature and improve our Modern Slavery Compliance Framework over the coming years. This reporting period prioritised building the foundations of the framework, in particular our policies and procedures and the establishment of a Modern Slavery Toolkit.

In FY26 we will focus on implementing the policies we have developed, including new operating entities in our Modern Slavery Framework; continuing to collect data and information on our Tier 1 suppliers; refreshing and reviewing our Modern Slavery risks based on this information; and establishing a home for the future monitoring and reporting of compliance against this framework.